

# Exhibit 19

## Matthew Heaphy

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**From:** Fuentes, Gabriel A. [GFuentes@jenner.com]  
**Sent:** Thursday, November 05, 2015 3:05 PM  
**To:** Geoff Rushing; Hoffman, Jory M.  
**Cc:** Rick Saveri; Matthew Heaphy  
**Subject:** RE: telephone call yesterday

Dear Geoff:

Thank you for your email of yesterday evening concerning the discovery conference we held by telephone on November 3, 2015. Your email misstated our discussions in one important respect. We did not advise you that a file server and certain hard drives at MEVSA were not searched earlier because such a search "was deemed too time-consuming and expensive." Instead, we advised you that we initially believed that the high burden and cost associated with searching the file server was disproportionate to the likelihood of the search producing many documents relevant to the litigation. As to the hard drives, we explained that our initial conclusion was similar as to proportionality, particularly given that we already had searched archival email from which documents were produced. Nonetheless, we advised you that we revisited these initial conclusions upon discovery of the additional paper documents located in a MEVSA warehouse, and produced to you on September 24, 2015. We advised you that after the identification and production of the warehouse documents, we decided to search the file server and certain hard drives out of an abundance of caution.

Regards,

Gabe Fuentes

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## Gabriel A. Fuentes

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**From:** Geoff Rushing [<mailto:Geoff@saveri.com>]  
**Sent:** Wednesday, November 04, 2015 7:10 PM  
**To:** Fuentes, Gabriel A.; Hoffman, Jory M.  
**Cc:** Rick Saveri; Matthew Heaphy  
**Subject:** telephone call yesterday

Dear Gabe:

This will confirm our telephone conversation yesterday. You and Jory Hoffman were on for Mitsubishi and Rick Saveri and I were on for Direct Purchaser Plaintiffs ("DPPs").

You informed us that after the depositions of Messrs. Wasinger and Furokawa last July, your client became concerned that it was in possession of documents it had not searched in connection with DPPs' document requests. This led to the production of an additional eight boxes of documents last month, containing, as you noted, among other things, records of sales of CRT products in the United States.

You initiated the discussion yesterday (we called you back) in order to inform us that Mitsubishi had identified another very large group of documents stored on a file server, and on the hard drives of certain employees, including Mr. Wasinger and a Mr. Loftheuse, that had not been searched because it was deemed too time consuming and expensive. You informed us that you now believed those documents should be searched, and were beginning the process of doing so. You had not settled on search terms yet, and in view of the large amount of information to be searched -- you said "gigabytes" -- you could not tell us when you expected to be able to produce additional documents. You indicated that you believed that you would be in position to do so next week, and we agreed to talk then.

You also indicated that the documents to be searched were all U.S. documents, and that we should not expect to receive any additional documents from Japan.

Thank you. Please let me know if any of the foregoing is incorrect.

Best regards,

Geoff